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INDYZEN, INC. and PRAVEEN NARRA KUMAR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PARKRIDGE LIMITED, a Hong Kong
corporation, by Mabel Mak, and MABEL
MAK, an individual,

Plaintiffs,

v.

INDYZEN, INC., a California corporation,
and PRAVEEN NARRA KUMAR, an
individual,

Defendants.

CASE NO. 16-CV-07387-KAW

**DECLARATION OF ETHAN G. SOLOVE,
ESQ. IN SUPPORT OF PETITION FOR AN
ORDER COMPELLING ARBITRATION
PURSUANT TO 9 U.S.C. § 4**

Date: January 18, 2018
Time: 11:00 AM
Dept.: TBD
Judge: Hon. Kandis A. Westmore

I, Ethan G. Solove, declare as follows:

1. I am an attorney at law at Structure Law Group, LLP, attorneys for Defendants Indyzen, Inc., (“Indyzen”) and Praveen Narra Kumar (“Indyzen”) (collectively the “Defendants”). I make this declaration in support of Defendants’ Petition for an Order Compelling Arbitration pursuant to 9 U.S.C. § 4. The facts stated herein are true of my knowledge, except for those based on belief which I believe to be true. If called upon, I could and would competently testify thereto.

2. On October 5, 2017, Parkridge’s and Mak’s attorney Adam Wolek, Esq. sent a letter to Arbitrator Gary L. Benton in the arbitration for this case. (See the request for judicial notice accompanying this declaration at ¶ 5 and **Exhibit E** thereto.) In footnote 2 of that letter,

1 Mr. Wolek said that he was sending an audio recording of Randy Dobson, along with the letter,
2 that contained Mr. Dobson's "explanation of the underlying circumstances leading to this
3 dispute." My office has transcribed the audio recording, and a true and correct copy of this
4 transcription is attached hereto as **Exhibit A**. My office is more than willing to send the actual
5 recording to the Court for its reference at the Court's request.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct. Executed on December 14, 2017.

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Ethan G. Solove